



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

December 7, 2022

VIA ECF

Hon. Ronnie Abrams
United States District Judge
United States District Court
40 Foley Square
New York, New York 10007

Re: *Rahman v. U.S. Citizenship and Immigration Services, et al.*, 22 Civ. 9778 (RA)

Dear Judge Abrams:

This Office represents the government in this action in which the plaintiff seeks an order compelling U.S. Citizenship and Immigration Services (“USCIS”) to adjudicate an Application to Register Permanent Residence or Adjust Status (Form I-485). I write respectfully to request that the initial status conference presently scheduled for December 16, 2022, be rescheduled to the week of February 13, 2023 or thereafter (with a corresponding extension of time for the preconference submission).

I respectfully request this adjournment because the complaint was served on the government by mail on November 30, 2022. Pursuant to Rules 12(a)(2) and 6(d) of the Federal Rules of Civil Procedure, the government calculates the date for its response to the complaint to be February 1, 2023. *See* Fed. R. Civ. P. 12(a)(2) (sixty days), 6(d) (additional three days for service by mail). Additionally, the government needs time to review the complaint, confer with USCIS and determine next steps. The government apologizes for making this request one day before the preconference submission is due, *See* ECF No. 23, but only learned of the Court’s December 6 order, when I filed my notice of appearance. This is the government’s first request for an adjournment of the pretrial conference. Plaintiff consents to this request.

I thank the Court for its consideration of this letter.

Respectfully submitted,

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cc: Counsel of record (via ECF)

Application granted. The initial pretrial conference scheduled for December 16, 2022 is hereby adjourned until February 17, 2023 at 2:15 p.m. The parties shall submit their joint letter and proposed case management plan no later than February 10, 2023.

SO ORDERED.



Hon. Ronnie Abrams
12/8/2022